



Bates No.	Date	Description of Document	Privilege Asserted
TNT013310-TNT013315	2/15/2017	Emails from D. Diedrich of NBIS to D. Johnson of SmithAmundsen, re IICH's claim, factual background, and SmithAmundsen's representation of IICH	Attorney-client privilege
TNT013322-TNT013327	9/7/2017	Insurance Claim Reporting Form - Coverage Analysis	Insurer-insured/Work Product
TNT013416	3/20/2017	Emails between TNT and SmithAmundsen re relevant facts and documents pertaining to the Osborn Project	Attorney-client privilege
No Bates	9/20/2016	Email from T. Tran, in-house counsel for TNT, to TNT personnel re preparation of Union Card, including counsel's advice re preparation of same (attachment: union card w/ notes)	Attorney-client privilege
No Bates	9/20/2016	Email from B. Murray to M. Babcock and J. Clary, forwarding T. Tran email re Union Card, for purposes of obtaining counsel's advice re preparation of same (attachment: union card w/ notes)	Attorney-client privilege
No Bates	9/20/2016	Email from T. Nguyen, on behalf of T. Tran, to B. Murray with Union Card, including counsel's advice re preparation of same (attachment: union card w/ notes)	Attorney-client privilege
No Bates	9/20/2016	Email from B. Murray to M. Babcock and J. Clary, forwarding T. Nguyen Email with Union Card, including counsel's advice re preparation of same (attachment: union card w/ notes)	Attorney-client privilege
No Bates	Eff. 2/23/2017	Joint Representation Agreement between TNT and IICH with effective date February 23, 2017, signed by TNT on January 15, 2019, and by IICH (now HDI) on January 23, 2019.	Attorney-client privilege/Work Product

No Bates	2/23/2017	Email from D. Diedrich of NBIS to T. Tran, in-house counsel for TNT, and D. Johnson of SmithAmundsen, re IICH's claim and scope of SmithAmundsen's representation of TNT and IICH	Attorney-client privilege
No Bates	2/24/2017	Email from T. Tran, in-house counsel for TNT, to D. Diedrich of NBIS and D. Johnson of SmithAmundsen, re SmithAmundsen's representation of TNT and IICH	Attorney-client privilege
No Bates	9/25/2017	Email from D. Johnson of SmithAmundsen to T. Tran, in-house counsel for TNT, cc D. Diedrich of NBIS and H. Bub of SmithAmundsen, re assignment of rights to IICH	Attorney-client privilege
No Bates	10/27/2017	Email from H. Bub of SmithAmundsen to T. Tran, in-house counsel for TNT, re assignment of rights to IICH	Attorney-client privilege
No Bates	10/27/2017	Email from T. Tran, in-house counsel for TNT, to H. Bub of SmithAmundsen, re value of IICH's claim	Attorney-client privilege
No Bates	11/9/2017	Email from H. Bub of SmithAmundsen to T. Tran, in-house counsel for TNT, re calculation of value of IICH's claim	Attorney-client privilege/Work Product
No Bates	11/10/2017	Email from T. Tran, in-house counsel for TNT, to H. Bub of SmithAmundsen, forwarding executed Assignment and discussing value of IICH's claim	Attorney-client privilege
TNT015661 - TNT015662	9/19/2016	Email from B. Murray to T. Tran, in-house counsel for TNT, and A. Bell, cc to M. Appling and B. Wenneshiemer, for purposes of obtaining counsel's advice re same (attachment: blank union card)	Attorney-client privilege

TNT015663 - TNT015669	9/19/2016	Emails between T. Tran, in-house counsel for TNT, B. Murray, A. Bell, M. Appling and B. Wenneshiemer, re counsel's advice re Union card	Attorney-client privilege
TNT013705	Redacted	REDACTION: Email from TNT General Counsel, T. Tran, forwarding the below email to D. Johnson; email from D. Johnson forwarding the below email to SmithAmundsen LLC paralegal A. Starks for production in litigation	Attorney-client privilege/Work Product
TNT013744	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013748	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013751	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013754	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013757	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege

TNT013760	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013764	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013768	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013769	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013772	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013774	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT013993	Redacted	REDACTION: Email from D. Ford's email account forwarding the below email to TNT General Counsel, T. Tran, for production in litigation	Attorney-client privilege
TNT015246	N/A	REDACTION: Insurance Policy premium information	Privileged/ Confidential

TNT015260	N/A	REDACTION: Insurance Policy premium information	Privileged/ Confidential
TNT015273	N/A	REDACTION: Insurance Policy premium information	Privileged/ Confidential
TNT015294	N/A	REDACTION: Insurance Policy premium information	Privileged/ Confidential
TNT015655 - TNT015657	Misc. in 2014	REDACTION: Personal identifying information contained in TNT employee's Union Local No. 139 cards for Wisconsin project, including social security numbers, home addresses and phone numbers	Privileged/ Confidential/ Required by Federal Rules
No Bates	5/7/2018	Email from T. Tran, General Counsel for TNT, to F. Peatross in TNT's IT department, re electronic mail search for M. Applling, B. Wennesheimer, B. Murray, T. Pierce and C. Jeffcoat for the period of May 1, 2016 – December 31, 2016	Attorney-client privilege
No Bates	5/9/2018	Emails between T. Tran, General Counsel for TNT, and F. Peatross in TNT's IT department, re electronic mail search for the terms "whiteconstruction.com" and "jea.net" for the period of 8/1/16-12/31/16	Attorney-client privilege
No Bates	11/16/2018	Emails between T. Tran, General Counsel for TNT, and C. Laverne in TNT's IT department, re electronic mail search for M. Babcock, J. Clary, D. Johnson, C. Patrick, and K. Hawkins	Attorney-client privilege
No Bates	4/4/2018	Emails between T. Tran, General Counsel for TNT, and F. Peatross in TNT's IT department, re electronic mail search for D. Ford	Attorney-client privilege
No Bates	11/12/2018	Emails between T. Tran, General Counsel for TNT, and TNT's Help Desk, re electronic mail search for M. Babcock, J. Clary, D. Johnson, C. Patrick, and K. Hawkins	Attorney-client privilege

No Bates	9/20/2016	Email from T. Tran, General Counsel for TNT, to B. Wenneshiemer, B. Murray, and A. Bell re modified quote incorporating Standard Terms and Conditions, and re modified Daily Field Report, attaching both, and giving advice and instruction as counsel	Attorney-client privilege/Work Product
No Bates	10/21/2016	Emails between T. Tran, General Counsel for TNT, and B. Wenneshiemer, re unsigned modified quote incorporating Standard Terms and Conditions	Attorney-client privilege
No Bates	4/6/2018	Emails between T. Tran, General Counsel for TNT, and N. Ducharme in TNT's IT department, re electronic mail search for D. Ford	Attorney-client privilege
No Bates	4/25/2018	Emails between T. Tran, General Counsel for TNT, and B. Blair re project emails; includes email with outside counsel re conference call	Attorney-client privilege